

# **EXHIBIT 15**

Jack Siemiatycki, Ph.D.

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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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IN RE JOHNSON & JOHNSON ) MDL No.  
TALCUM POWDER PRODUCTS ) 16-2738 (FLW)(LHG)  
MARKETING SALES PRACTICES, )  
AND PRODUCTS LIABILITY )  
LITIGATION )  
 )  
THIS DOCUMENT RELATES TO )  
ALL CASES )  
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VIDEOTAPED DEPOSITION OF

JACK SIEMIATYCKI, Ph.D.

MONTREAL, CANADA

THURSDAY, JANUARY 31, 2019

9:49 A.M.

Reported by: Leslie A. Todd

1 two things with my two ears.

2 MS. PARFITT: Sorry.

3 THE WITNESS: Can you repeat the last  
4 part?

5 BY MS. BRANSCOME:

6 Q Yeah. You would agree that all of the  
7 factors that might make someone susceptible to  
8 developing ovarian cancer are not currently known.

9 A That's correct.

10 So are -- are you -- are you getting at  
11 the potential impact of confounding as -- from  
12 unknown factors as something that hasn't been  
13 properly evaluated or that is part of this  
14 picture?

15 Q I am simply asking you --

16 A Yes.

17 Q -- questions about your opinions.

18 A Yes, yeah.

19 Q But you agree that the possibility of an  
20 unknown confounding variable is something that, as  
21 an epidemiologist, you would at least consider  
22 when looking at the strength of association  
23 established by epidemiological studies, correct?

24 A I would consider it, and I've considered  
25 it in the context of this literature, and in my